UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)		
v.)	Criminal No.	20-CR-40038
KOKOU KUAKUMENSAH)		
)		
Defendant)		
)		
)		
)		
)		
)		

MEMORANDUM IN SUPPORT OF GOVERNMENT'S MOTION FOR DETENTION

Now comes the United States and hereby files this memorandum to provide supplemental information in support of its motion for detention. The Court held a detention hearing in this matter on January 14 and 15, 2021. On January 19, 2021, the government learned the following information from Task Force Officer Peter Pasciucco. When investigators booked the defendant on January 13, 2021, he was in possession of (a) four credit cards each in four names other than his own and (b) seven prepaid debit cards. These cards were all located in the defendant's wallet. As argued at the detention hearing, the government believes that the defendant used prepaid debit cards as part of the scheme underlying the indictment.

Respectfully submitted,

ANDREW E. LELLING United States Attorney

By: /s/ John T. Mulcahy

John T. Mulcahy

Assistant U.S. Attorney

Date: January 19, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

By: /s/ John T. Mulcahy

John T. Mulcahy

Date: January 19, 2021